

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

FEBRUARY 27 2012
 WILLIAM M. McCOOL, Clerk
 By [Signature] Deputy

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON
 AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMILIAN MADALIN NITA,

Defendant.

CR 12 5075 BHS

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Use of Forged Passport)

On or about December 28, 2010, at Bremerton, within the Western District of Washington, the defendant, EMILIAN MADALIN NITA, did willfully and knowingly use a false, forged, counterfeited, and altered passport, to wit, by presenting a false, forged, counterfeited, and altered Slovakian passport, in the false name of D.S., in order to open a bank account at a branch of Bank of America.

All in violation of Title 18, United States Code, Section 1543.

COUNT TWO

(Use of Forged Passport)

On or about January 20, 2011, at Silverdale, within the Western District of Washington, the defendant, EMILIAN MADALIN NITA, did willfully and knowingly

1 use a false, forged, counterfeited, and altered passport, to wit, by presenting a false,
2 forged, counterfeited, and altered Slovakian passport, in the false name of D.S., in order
3 to open a bank account at a branch of Bank of America.

4 All in violation of Title 18, United States Code, Section 1543.

5 A TRUE BILL:

6 DATED: 2/29/12

7 *Signature of Foreperson redacted pursuant*
8 *to the policy of the Judicial Conference*

9 FOREPERSON

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11
12 JENNY A. DURKAN
United States Attorney

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14 
15 ANDREW C. FRIEDMAN
16 Assistant United States Attorney

17
18 
19 DAVID REESE JENNINGS
20 Assistant United States Attorney